

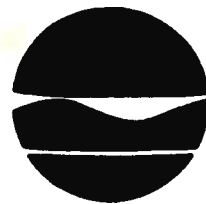
**New York State Department of Environmental Conservation**

**Region 3**

**21 South Putt Corners Road**

**New Paltz, NY 12561-1696**

**914-255-5453**



**Thomas C. Jorling**  
**Commissioner**

May 21, 1991

Les Skoski  
Ebasco Environmental  
160 Chubb Ave  
Lyndhurst, NJ 07071  
Re: Magna Metals Site # 360003

Dear Mr. Skoski,

I enclose the following comments on the proposed Field Sampling Plan for the RI/FS activities at the subject site.

To summarize our proceedings thus far:

At our original meeting at this site we discussed the idea of an initial "screening" sampling round to up-date our information and determine the scope of the RI. Due to the ongoing consent order's specification that an RI Workplan be approved prior to its signing, review of current data, and your preference to conduct surface sampling simultaneously with well drilling, we have expanded the scope of this sampling plan so that it will serve as the Field Sampling Plan called for in the RI. This changes the purpose from "screening" to "defining the extent of contamination".

Field Sampling Plan

- 1-7 Although general history can be put into the RI report, sampling history and all sampling results are essential as they are the foundation of the FSP. Type of waste disposed and all 1978, and some 1983 & 1984 sampling results are missing. It should be noted that leach pits (excluding septic tank & holding tank) were emptied by suction hose in 1979. Each sampling summary table must include locations of samples, ie. in Table 1-4 sample 04 corresponds to sediment in brook 100' above pond. All of the above information is provided in the enclosed sampling summaries and Site Description & History.
- 1-9 The finding of 2,700 PPB Vinyl Chloride in brook sediments is not mentioned. The conclusion that "the primary emphasis of the field investigation should be on volatile organics" is correct, however, the possibility of heavy metal contamination of the soils beneath and surrounding the pits must be considered. (see 3-19)
- TABLE 3-1 Samples for VOAs should not be pH adjusted.
- 3-14 One Soil/Sludge sample must be taken from the holding tank at the side of the building and from any other pits discovered during clearing of area. Water standing in the tanks must be sampled if it is present.
- 3-16 One sediment sample should be taken at the inlet of the pond.
- 3-18 Decant water from sediment samples before transferring to

bottles.

- 3-19 It is stated that 3 shallow samples will be taken at mapped locations and 3 at the mid-point of the slope. This will tell us if contamination from the overflow of the pits in 1979 is still present but will not find contamination leached from the pits. The pits were designed to leach into the soil and plating wastes were discharged to them for a period of possibly 29 years (assuming the age of the pits corresponds to the start of operations). To find this we need to do either borings or test pits in the expected area of discharge to a depth of at least ten feet; OR remove the pits and sample beneath them.

In reviewing the files I have found several references to a solvent storage tank which was removed from the northwest corner of the Magna Metals building. One soil sample should be taken from this area.

- 3-21 Air rotary drilling & mud rotary drilling will not be approved as field changes unless supplementary information is provided. For air, provide manufacturer's spec's describing filtration method; for mud, detail plans to mitigate its capacity to adsorb contaminants, the possibility that it may bring contamination to the hole, and the problem of its capacity to adhere to the sides of the hole.

- 3-22 How will water table elevation be determined during drilling? (By measuring water depth or observing split spoon samples?).

- 3-23 It is stated that well screens will be .010 or .020. If this is to be a field call by the site geologist based on observation of subsurface soils be sure that driller comes prepared with both sizes of screens, as well as appropriate filter pack sands.

Wells may be developed no sooner than 24 hours after installation.

- 3-24 One sample at each geologic change at each well, as well as one sample from the screened area, should be analyzed for particle size or Atterbergs Limit.

- 3-25 #5 Check samples with HNu immediately upon opening split spoon.

- 3-27 Submersible pumps are not allowed in monitoring wells.

- 3-28 #11 Bailers and wire or cord must be dedicated. Decon must be done on fresh wire or cord, bailers should be brought to the site deconned and wrapped in foil. (What cutting oils??)

- 3-32 Decon can be done with Methanol and DI water; no hexane, no acetone. Again, bailers must be dedicated. Sampling equipment such as triers, scoops, trowels are best if dedicated, but may be de-conned if necessary.

- 4-1 All field changes must be jointly approved by the Consultant Project Manager & the NYSDEC Project Manager before implementation.

#### Health & Safety Plan

- 5 Again, the presence of Vinyl Chloride is not mentioned.

#### QAPP

- 24 Again, all field changes must be jointly approved by the Consultant Project Manager & the NYSDEC Project Manager before implementation.

Comments from Fish & Wildlife are included.

Comments from QA/QC are included. Note: After reviewing 1984 samples we have found that the site was not, as we had thought, previously screened for PCB's, Dioxins and Pesticides (lab results were misleading). This means that we will need to do the full TCL on our first sampling round.

Please submit a schedule for these sampling activities with the revised FSP & QAPP.

Also enclosed you will find a Critical Path Analysis chart, graph and table. I have listed the tasks planned on this site and determined their most probable sequence. Please look carefully at the tasks assigned to "PRP" and advise me as to the accuracy of the estimated duration of these activities. If you have suggestions regarding the timing of the tasks, please let me know.

CPA Activities which have not been discussed previously include:

\*Existing wells survey: The Department of Health has decided not to take on this task, but our sampling efforts will be strengthened if we can sample wells either on the site or near it before finalizing the FSP. We also need this survey for the Risk Assessment.

Habitat Based Assessment: Suggested by our Fish & Wildlife Division and explained in the enclosed documents.

\*Survey Pits: We discussed the need to locate all existing pits. in order to predict contaminant migration we need to also describe the pathways of the connecting pipes and the design of the pits. (We don't really know where the leachate was designed to flow or whether the septic tanks and the leach pits are connected)

Determination of clean-up levels: We will want to define clean-up levels for each contaminant in each matrix in the schedule of work document and refine them (with guidance from our Technology Section) as data comes in. The Site Characteristics Fact Sheet needs to be completed once all analytical data has been recieved.

\* to be done prior to Field Sampling.

I also wanted to note a few items that should be included in your RI report:

The registry form for the site

A topo map indicating relative location of site.

Note that filling in or removal of all pits will be included in the final remedial action.

Please call me at (914) 255-5453 if you have any questions.

Sincerely,

Molly Gallagher,  
DHWR, Reg. 3

cc: Allen Kaden  
Ed Wactlar  
Natasha Court  
Joe Crua  
Rosalie Rosinko  
Marsden Chen  
John Henkes